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Attorneys for Defendant Robert Roman

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the
Liquidation of Bernard L. Madoff Investment
Securities LLC,

Plaintiff,

v.

ROBERT ROMAN,

Defendant.

SIPA LIQUIDATION

Adv. Pro. No. 08-01789 (SMB)

(Substantively Consolidated)

Adv. Pro. No. 10-04292 (SMB)

DECLARATION OF HELEN DAVIS CHAITMAN

I, Helen Davis Chaitman, hereby declare, under penalty of perjury pursuant to 28 U.S.C.

§1746, as follows:

1. I am a partner with Chaitman LLP, counsel to defendant Robert Roman (“Defendant”). I am a member of the bars of New York and New Jersey, and of this Court.

2. I submit this declaration in opposition to the Trustee’s motion to compel discovery pursuant to Fed. R. Bankr. P. 7037(a)(3)(B).

3. Attached hereto as **Exhibit A** is a true and accurate copy of relevant pages of hearing transcript dated February 7, 2017.

June 20, 2017

/s/ Helen Davis Chaitman